

PHILLIP A. TALBERT  
Acting United States Attorney  
MICHAEL D. ANDERSON  
Assistant United States Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700  
Facsimile: (916) 554-2900

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
v.  
GARY STEPHEN MAYNARD,  
  
Defendant.

CASE NO. 2:21-CR-00224 TLN

STIPULATION AND ~~[PROPOSED]~~ PROTECTIVE  
ORDER RE: DISSEMINATION OF DISCOVERY  
DOCUMENT AND/OR INFORMATION SUBJECT  
TO A PROTECTIVE ORDER

**STIPULATION**

IT IS HEREBY STIPULATED AND AGREED among the parties and their respective counsel,  
as follows:

1. This Court may enter protective orders pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, and its general supervisory authority.
2. This Order pertains to all discovery provided to and/or made available to defense counsel as part of discovery in this case (hereafter, collectively known as “the discovery”).
3. The parties request a protective order with regard to the discovery in this case so as to protect third parties’ personally identifying information (“PII”).
4. Further, the parties request that the Court permit the government to provide in discovery pursuant to this order sealed search warrant affidavits and other sealed process from the investigation of the Defendant.

1       **A. Provisions Pertaining to All Discovery**

- 2       5. Defense counsel, members of the defense team, and the defendant shall use the discovery  
3       solely for the legal representation of the defendant and not disclose any of the discovery  
4       and/or information to any person and/or entity other than their respective defendant/client,  
5       and/or witnesses that they may be interviewing and/or preparing for trial and/or attorneys,  
6       law clerks, paralegals, secretaries, experts, consultants and/or investigators involved in the  
7       representation of defense counsel's defendant/client in this case.
- 8       6. Defense counsel will store the discovery in a secure place and will use reasonable care to  
9       ensure that it is not disclosed to third persons in violation of this agreement.
- 10      7. At the conclusion of the case and any related appeal or collateral attack litigation, defense  
11      counsel may retain a copy of the discovery for the purposes of fulfilling defense counsel's  
12      ethical obligations and for any record retention requirements of the federal defender's  
13      office. All other copies of the discovery will be returned to the government or destroyed.

14      **B. Additional Provisions Regarding Discovery Containing PII**

- 15      8. Defense counsel shall redact Personally Identifying Information ("PII") from any copies  
16      of discovery provided to the defendant. Defendant is prohibited from copying materials or  
17      maintaining personal copies of any materials containing PII, including but not limited to  
18      written document and audio or visual records, and shall be prohibited from transporting  
19      any of these materials that contain PII to his cellblock. This redacted discovery remains  
20      subject to all other provisions set forth in this stipulation.

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C. **Defense Counsel Obligation to Inform of the Protective Order**

9. Defense counsel shall each be responsible for advising defense counsel's defendant/client, employees and other members of the defense team and defense witnesses of the contents of this Stipulation and Order.

IT IS SO STIPULATED.

Dated: November 22, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

/s/ Michael D. Anderson  
MICHAEL D. ANDERSON  
Assistant United States Attorney

Dated: November 22, 2021

/s/ Hannah Labaree  
HANNAH LABAREE  
Counsel for Defendant  
GARY STEPHEN MAYNARD

**[PROPOSED] ORDER**

For good cause shown, the stipulation of counsel in criminal case number 3:21-MJ-00007, is approved and

FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

DATED: November 23, 2021

Allison Claire  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE